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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

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In the Matter of

ADVANCED TELEVISION SYSTEMS
AND THEIR IMPACT UPON THE
EXISTING TELEVISION
BROADCAST SERVICE

MM Docket No. 87-268

To: The Commission

PAPPAS STATIONS PARTNERSHIP'S
PETITION FOR PARTIAL RECONSIDERATION

Pappas Stations Partnership ("PSP"), by its undersigned counsel and pursuant to 47 U.S.C. Section 405 (1996) and 47 C.F.R. Section 1.429 (1996), hereby respectfully submits this Petition for Partial Reconsideration of the Commission's Sixth Report and Order in the above-referenced proceeding (the "Sixth Report").

^{1/} In support, PSP respectfully offers the following:

- 1/ Sixth Report and Order in MM Docket No. 87-268, In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, FCC 97-115, adopted on April 3, 1997 and released on April 21, 1997, 12 FCC Rcd _____.

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1. This Petition is timely filed, within 30 days of the publication in the Federal Register of public notice of the Sixth Report. 62 Fed. Reg. 26683 (published on May 14, 1997). See 47 C.F.R. Sections 1.429(d) and 1.4(b)(1) (1996).

2. PSP holds a license, inter alia, from the Commission to operate commercial television broadcast station KPTM (TV) on National Television Systems Committee ("NTSC") Channel 42, allotted to Omaha, Nebraska. KPTM (TV) is an affiliate of the Fox Broadcasting Company ("FBC") and provides the only over-the-air FBC television programming that is available to many of the residents of KPTM (TV)'s service area.

3. The Sixth Report allotted digital television broadcast ("DTV") Channel 43 to be "paired" with KPTM (TV)'s NTSC Channel 42. Sixth Report, at Table 1 (Page B-29). PSP respectfully petitions the Commission to reconsider the allotment of Channel 43 as KPTM (TV)'s paired DTV allotment, and instead to allot a non-adjacent-channel DTV allotment as KPTM (TV)'s paired DTV channel.

4. PSP believes that the public interest would be better served by allotting a non-adjacent-channel DTV allotment as KPTM (TV)'s paired DTV channel than by allotting Channel 43 as KPTM (TV), NTSC Channel 42's paired DTV channel. Although PSP understands that adjacent-channel NTSC and DTV allotments are being made in a limited number of cases to the same entity, such allotments raise the specter of DTV-to-NTSC interference. Such allotments also preclude operation of the NTSC and DTV channels from a single antenna combiner. PSP would prefer to operate its NTSC and DTV channels from a combined antenna, in order to reduce the capital costs of the transition from NTSC to DTV.

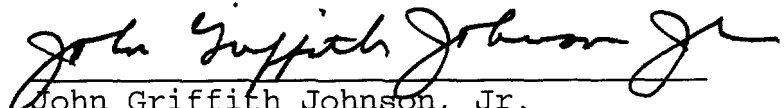
5. Given the relatively low density of television channel utilization in the Great Plains portion of the country where KPTM (TV) operates, PSP is confident that the Commission can identify a suitable DTV channel allotment to pair with KPTM (TV)'s NTSC Channel 42 allotment that will not be first-adjacent to Channel 42. ^{2/}

^{2/} Neither PSP nor its consulting broadcast engineers currently have access to the computer software or the underlying assumptions that the Commission used to construct the Table of DTV Channel Allotments set forth in Table 1 of the Sixth Report. Therefore, through no fault of its own, PSP is at a loss to recommend a specific non-adjacent-channel DTV allotment that could be paired with NTSC Channel 42. However, PSP believes
(continued...)

Respectfully submitted,

PAPPAS STATIONS PARTNERSHIP

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June 11, 1997

2/ (...continued)

that the Commission, utilizing the computer programs and the assumptions that were used to construct Table 1 of the Sixth Report, can find a suitable non-adjacent-channel DTV allotment that could be paired with NTSC Channel 42. In the event that PSP or its consulting broadcast engineers come into possession of information sufficient to enable them to perform a channel availability study for the Table of DTV Channel Allotments, PSP reserves the right to supplement this Petition for Partial Reconsideration with a specific recommendation for a non-adjacent-channel DTV allotment that could be paired with NTSC Channel 42.